



**Filed by:** Elbert County Wireless, L.L.C.  
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**Date:** September 2005

**To:** Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**By Electronic Submission:**

Michael Wilhelm, Chief  
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Public Safety and Critical Infrastructure Division  
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Elbert County Wireless, L.L.C. (“ECW”) hereby submits its E911 Interim Report, pursuant to *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 7709, 7771 ¶172 (2005) (“*Order*”).

**Carrier Identifying Information:**

**Carrier Name:** Elbert County Wireless, L.L.C. – FRN 0006-8010-05

**E911 Compliance Officer:** Petr Valkoun  
400 Northridge Road, Suite 130  
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**E911 Implementation Information:**

ECW is operating as a “carriers’ carrier”, *i.e.*, ECW serves only the customers of other carriers. Thus, ECW has no subscribers and will not have any subscribers. Based on this premise, ECW hereby reports as follows:

- ECW has not received any Phase I or Phase II requests from PSAPs. ECW has obtained and installed all of the equipment and software necessary to meet any Phase I request it may receive from a PSAP, but will have to work with a local exchange carrier (“LEC”) to have a landline installed between the switch and a requesting PSAP for Phase I deployment when the time comes. It could take the LEC as long as 12 or even 18 months to install a new landline in the rural areas where ECW is operating.

ECW has no subscribers, thus ECW does not have the means to fund any Phase I or Phase II implementation and recurring costs via pass-throughs to subscribers. Because ECW has not yet received any Phase I or Phase II requests, it has not yet explored the availability of any state or local cost recovery programs for E-911 implementation.

- ECW elected a handset-based solution for Phase II E-911. ECW is using analog and TDMA technology at all of its cell sites and has added a GSM and CDMA overlays, to meet the demands of its roaming customers. ECW continues to anticipate a significant problem with its Phase II E-911 deployment. There is currently no Phase II-compliant handset-based solution available for TDMA or GSM technology, and it appears from all available market information that one will not become available any time in the near future.

ECW’s CDMA overlays at its cell sites will operate off of a switch in Iowa owned and operated by an unaffiliated carrier, pursuant to a written agreement. Since ECW has not received any Phase II requests, it has not moved forward with Phase II on the CDMA level.

- Moreover, ECW is unable to switch to a network-based solution, because it is technically impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques, which can work only when the network is receiving location information on the involved mobile unit from three different cell sites, or angle of arrival techniques (“AOA”), which can work only when the network is receiving location information from at least two different cell sites.

ECW operates only in less densely populated areas and the cell sites are spread far apart, and there is significant terrain blockage between some of the cell sites. There is little overlap between the two cells, and even less overlap among three cells. Thus, only a small portion of ECW’s service area is susceptible to either triangulation or AOA techniques; the bulk of the service area is not susceptible to such techniques. Therefore, even if ECW were to implement Phase II E911, it would never be able to reach the required 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules. ECW has a request pending with the Commission for a permanent waiver of the Phase II requirements.

- For the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA and GSM handsets and the impossibility of employing a network-based solution, both of which are beyond ECW’s control, ECW does not anticipate that full Phase II service will be available in its network any time in the near future. ECW is continuing to monitor the marketplace for new technology that will provide adequate Phase II E-911 service to rural markets.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.